

EXHIBIT D

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Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 Case No.: 1:19-cv-05434 (VM)

4 - - - - -

5 STATE OF NEW YORK, STATE OF)
6 CALIFORNIA, STATE OF COLORADO,)
7 STATE OF CONNECTICUT, STATE OF)
8 COLUMBIA, STATE OF MARYLAND,)
9 STATE OF MICHIGAN, STATE OF)
10 MISSISSIPPI, COMMONWEALTH OF)
11 VIRGINIA, and STATE OF WISCONSIN)
12 Plaintiffs,)

13 -against-)

14 DEUTSCHE TELEKOM AG, T-MOBILE US)
15 INC., SPRINT CORPORATION and)
16 SOFTBANK GROUP CORP.,)
17 Defendants.)

18 - - - - -

19 Friday, November 8, 2019
20 9:36 a.m.

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22 VIDEO DEPOSITION OF THORSTEN LANGHEIM,
23 taken by Plaintiff State of New York, held at
24 Gibson, Dunn & Crutcher LLP, Telephone House,
25 2-4 Temple Avenue, London EC4Y 0HB, United Kingdom,
reported by Chanelle Malliff, Realtime Court
Reporter of the United Kingdom and Europe.

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1 THORSTEN LANGHEIM

2 to check that with Mr. Budde.

3 Q. With Mr. who?

4 A. Budde. Matthias Budde. He's the head of
5 strategy.

6 Q. And if you look at the page that says 17975 in the
7 bottom right-hand corner?

8 MR. SOVEN: Are you talking about the cover page,
9 Kyle?

10 BY MR. MACH:

11 Q. Correct, yes, the cover page of the Bain & Company
12 deck. Why did DT work with both Bain and McKinsey on
13 similar assessments?

14 MR. SOVEN: Objection to form. Misstates prior
15 testimony. You can answer.

16 A. I know whether we've worked together with them.
17 We invite consultants, analysts, and smart cookies to come
18 to us and explain their view of the world. So they have
19 been there and presented their views. I don't know whether
20 they have been mandated by DT to do so. I don't.

21 BY MR. MACH:

22 Q. So I'm going to just ask you to put Langheim
23 Exhibit 15 in front of you again.

24 A. Yeah.

25 Q. And are you saying that it's your belief that

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2 McKinsey assisted in the creation of Langheim Exhibit 15
3 without being hired by DT?

4 A. I don't know. I believe -- I can only say what
5 I believe. I don't know it. I believe that they pitched to
6 try to get a mandate, which I don't think they have gotten.
7 That's to my best knowledge.

8 Q. But you don't know?

9 A. I don't know.

10 Q. So, sorry, I got us sidetracked. Let's turn back
11 to what was marked as 16. Do you have that in front of you?

12 A. Yes.

13 Q. And to the page that contains the Bain & Company
14 deck. Do you have that in front of you?

15 A. Yes.

16 Q. Was the Bain & Company deck used for discussions
17 within DT?

18 A. The strategy team may have used it for discussions
19 within DT maybe. Maybe. I just took it as one -- as this
20 McKinsey paper, as a Goldman Sachs research note I'm quoting
21 here, as this text that I may have copied out of something
22 else, just to collect a lot of information because I was
23 soul searching at the time about: "Where do I allocate
24 capital from DT? U.S., Europe, Eastern Europe, T-Systems,
25 DT Cap?" As I said before, I asked seven guys to come up